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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLOS MUNOZ, individually and on behalf of all others
similarly situated,

07 – CV – 10531 (AKH)

Plaintiff,

- against -

CHINA EXPERT TECHNOLOGY, INC.,; PKF NEW
YORK, CERTIFIED PUBLIC ACCOUNTANTS, A
PROFESSIONAL CORPORATION, PKF HONG KONG,
CERTIFIED PUBLIC ACCOUNTANTS; BDO MCCABE
LO LIMITED CERTIFIED PUBLIC ACCOUNTANTS,
BDO SEIDMAN, LLP,

Defendants.

**NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT AS
AGAINST DEFENDANT PKF CERTIFIED PUBLIC ACCOUNTANTS, A
PROFESSIONAL CORPORATION, sued here as PKF NEW YORK, CERTIFIED
PUBLIC ACCOUNTANTS, A PROFESSIONAL CORPORATION**

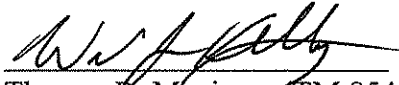
PLEASE TAKE NOTICE that upon the accompanying Declaration of William J. Kelly, Esq., dated April 28, 2009, and the exhibits annexed thereto, and upon the Declaration of Henry A. Freire, CPA, dated April 28, 2009, and the exhibits annexed thereto, the defendant PKF, Certified Public Accountants, A Professional Corporation, sued here as “PKF New York, Certified Public Accountants, A Professional Corporation”

("PKF New York"), will move this Court, at a time to be determined by the court, at the United States District Court located at Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312 or as soon thereafter as counsel may be heard, for an order pursuant to Fed. R. Civ. Pro. 12(b)(6) and 9(b), and the Private Securities Litigation Reform Act, for an order dismissing the complaint as against PKF New York, in its entirety and for any other relief the court finds just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 6.1(b) any and all opposing Affirmations and/or Affidavits are to be served within 10 business days of the date of service of this motion.

Dated: New York, New York
April 28, 2009

Wilson, Elser, Moskowitz, Edelman
& Dicker LLP

By: 
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